



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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December 6, 2007

Dan and Dawn Williams
1022 Washington Avenue
Libby, MT 59923

Re: 1022 Washington Avenue, Libby, Montana

Dear Mr. and Mrs. Williams,

The purpose of this letter is to respond to questions in a letter from you dated November 13, 2007. Additionally, I would like to schedule a meeting to discuss your concerns as they relate to the removal action performed at your property, and any upcoming remodeling activities that are planned.

As you know, EPA contractors completed a response action at the property in 2006, and also a quick response action in 2007. All work was conducted pursuant to the cleanup criteria established by EPA in the Action Memorandum Amendment dated May 9, 2002 for the Libby Asbestos Site. The property was sampled and assessed prior to conducting the clean up work. Based on both pre-removal dust sampling data and post-removal aggressive air clearance monitoring data, the US Environmental Protection Agency has no reason to prohibit or restrict the use of the residence located at 1022 Washington Avenue.

The best way for you to obtain meaningful answers to your questions is to understand what the property presented before the removal action, what the previous homeowner's agreed to, discuss the work plan approach and decisions made during the removal, and review the final air clearance samples collected. Please consider reviewing your property file that contains pre- and post-removal photographs, the final work plan, as well as dust and final clearance sample results. This information will be provided by the EPA, and will be made available to you during our meeting.

Question 1: Why was the insulation wrap that was filled with vermiculite not removed during the summer of 2006?

At the time of 2006 removal, the thermal systems insulation (TSI) pipe wrap and fittings were found to be in good condition, not friable, and encapsulated by cloth, therefore not requiring removal. The material you presented to Shawn Oliveira during his visit in November 2007, contained visible vermiculite, and appeared to be troweled onto certain pipe joints under the pipe wrap. Analytical results showed the mixture to be 15% chrysotile and less than 1% Libby Amphibole. As part of standard EPA removal criteria, EPA is not authorized to remove chrysotile pipe wrap under the Libby Superfund project. We did not know that there was LV containing mud underneath the pipe wrap on certain pipe joints. Additionally, out of 27

aggressive final air clearance samples, only 1 chrysotile asbestos structure was detected on 1 sample. Due to the fact that chrysotile structures were not found on the final aggressive air clearances, as well as the relatively good condition of the pipe wrap material, we did not feel the pipe wrap was a significant source of Libby Amphibole contamination.

Question 2: Why were the ends of the pipe wrap insulation wrapped with duct tape?

The edges of the chrysotile pipe wrap were open to the basement atmosphere during the removal. As you know, there were several failures in the basement during final air clearance sampling efforts. Since chrysotile pipe wrap is not part of our standard removal criteria, the pipe wrap was not designated to be removed as part of the work plan. The ends of the pipe wrap were open and contained visible dust. It was believed that the open pipe wrap ends could have served as a residual contamination source from being open to the basement atmosphere for years. It was decided to HEPA vacuum and seal the ends of the pipe wrap with duct tape to prevent potential dust releases during aggressive final clearance sampling procedures.

Question 3: Why was the hallway wall just painted instead of removing the mortar mixed with vermiculite?

During the design phase a bulk sample wasn't taken pursuant to EPA protocol. During the removal phase of the property the wall was assessed to be in good condition and not friable, except for a few minor cracks. These cracks were sealed with caulk, foam, and paint by the removal contractor. The homeowner at the time was notified and was agreeable. However, the plaster does appear to be cracking and has deteriorated since the initial removal, and should be evaluated as part of the EPA's ERS program which is designed to address residential vermiculite contamination outside of the standard approach by the EPA. The ERS program has been instituted to help local homeowners and contractors address Libby Vermiculite contamination that is outside of the standard EPA removal criteria.

Question 4: Is my basement Safe?

Chrysotile asbestos is a recognized hazard and can be dangerous to our health. Chrysotile asbestos, particularly pipe wrap, is typically evaluated by the concentration of asbestos in the pipe wrap, and the condition that it is in. If the material is friable, or crushed and readily made airborne by hand pressure, then it is considered dangerous. The superfund project here in Libby is designed to solely address contamination presented by Libby Amphibole asbestos, not the more common chrysotile asbestos. Millions of homes across the country share the same problem as your home with chrysotile pipe wrap, and it is typically up to the homeowner to pay for an asbestos abatement contractor to remove chrysotile pipe wrap.

You do have options however to ensure the safety of yourself and your family against a common residential hazard. A HEPA vacuum was provided to the home under the original removal action that you can use to remove contaminated dust from your basement. It is highly recommended that periodic dusting is performed in your basement with the HEPA vacuum to ensure the safety of your environment.

I would like to set up a meeting to further discuss your questions and concerns regarding the removal action performed at your property, and any remaining contamination concerns that you might have. It is my understanding that you are planning a significant remodeling project in the

near future, therefore it is important that we discuss these plans and your needs when we meet.

I hope this letter has been responsive to your questions and concerns. If you require further information regarding this matter, please do not hesitate to contact me at 406-293-6194.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Cirian". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Cirian, P.E.
EPA Remedial Project Manager